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DEPARTMENT OF MANAGEMENT  
**SERVICES**

4050 Esplanade Way • Tallahassee, Florida 32399-0950

LAWTON CHILES, GOVERNOR

WILLIAM H. LINDNER, SECRETARY

Information Technology Program  
Building 4030, Suite 180L

September 22, 1997

Honorable William Caton  
Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, D.C. 20554

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**FCC MAIL ROOM**

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RE: CC Docket 96-45 - Comments on Universal Service Support Distribution Options  
In Response to Public Notice DA 97-1957 Issued September 10, 1997

Dear Secretary Caton:

The Florida Department of Management Services (DMS) files these comments in response to the September 10, 1997 Public Notice issued by the FCC Common Carrier Bureau on the Universal Service Fund distribution methods and application process for schools, libraries, and rural health care facilities. As a member and active participant in the NASTD organization, DMS fully supports the comments filed by the National Association of State Telecommunications Directors in the above-referenced proceeding.

Chapter 282, Florida Statutes, assigns DMS responsibility for developing and maintaining the SUNCOM Network as the state communications system that provides local and long distance service to state agencies (including universities, community colleges, and libraries), political subdivisions of the state (including counties and school districts), municipalities, and certain nonprofit corporations (including private universities and health care providers). By statute, the SUNCOM Network is designed to transmit all types of communications signals, including voice, data, video, image, and radio. Chapter 287, Florida Statutes, requires DMS to competitively procure all services offered by the SUNCOM Network. Ninety-nine percent of the services offered by the SUNCOM Network are leased from the telecommunications industry in Florida. These services include the following:

Long Distance Telephone Service  
Local Telephone Service

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Florida Information Transport & Exchange Systems (FLITES)-

Dedicated Data Service

SNA Transport Service

Capitol Center FDDI Service

Internet Access

Router Transport Service

Frame Relay Transport Service

Florida Government Teleconferencing Network

The telecommunications services listed are provided with published prices as shown on the attached SUNCOM Network Services Rates sheet (See attached). SUNCOM's aggregated rates include those service and overhead costs incurred in providing services to comply with the statute that requires a system of equitable billing and charges. The SUNCOM Network, which is totally funded by fees charged to users for services, has existed under Florida law since 1975.

More recently, the 1995 Florida Education Facilities Infrastructure Improvement (EFII) Act (Chapter 364, Part II, F.S.) charged DMS with the task of providing Florida citizens with better access to education and health services through Advanced Telecommunications Services (ATS) for eligible facilities, as described in the enclosed ATS brochure. As a service agency, DMS will act as aggregator of Advanced Telecommunications Services competitively procured for eligible facilities throughout Florida. In our comments filed on July 16, 1997, DMS requested clarification as to whether the SUNCOM Network can be directly reimbursed for the appropriate discounts from the Universal Service Fund (USF) on behalf of Florida's schools, libraries, and rural health care providers. DMS also sought clarification on whether the SUNCOM Network prices qualify as pre-discount prices against which the discounts may be applied. Both Chapter 287, F.S., and Chapter 364, F.S., require DMS to negotiate specific rates for eligible facilities (schools, libraries, and rural health care) that generally will be even lower than the regular SUNCOM rates offered. In this regard, DMS directs specific comments to the 'Allocation of Aggregated Requests for Funds' portion of the FCC Public Notice. Specifically, DMS will focus on the U.S. Department of Education Working Group Report (WGR) released on July 31, 1997.

Although DMS generally supports the WGR recommendations, it is important for DMS to provide additional comments on specific issues related to the USF application and distribution process. DMS is in agreement with the WGR recommendation on the filing of technology plans, the inventory/assessment issue, and the WGR application form. In Florida, 5,500 eligible facilities have already filed technology plans with the

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state agency responsible for review, and those plans have been approved in compliance with the 1995 Florida EFII Act. Like the consortium relationship described in Section III, DMS does not have a "governance relationship" with Florida's eligible entities and is not involved in the approval of technology plans or inventory assessment.

DMS favors an application form that provides a simple and straightforward method of providing the needed information in applying for USF. However, in our last filing DMS requested that the FCC allow Florida to utilize the Advanced Telecommunications Services (ATS) Request Form (see attached) during the first year the USF is administered. This ATS form was developed for Florida's eligible facilities to qualify for ATS, as provided in the 1995 Florida EFII Act. Any additional information required to process applications by the Schools/Libraries Corporation (SLC) would be provided as an addendum to the Florida ATS form.

For the purpose of obtaining discounts from the USF, DMS requests to serve as the consortium agent for those eligible facilities in Florida that opt to be part of DMS consortia. Based on competitive bidding and high volume discounts, DMS has managed to obtain the best prices for our eligible users. Our long distance rates provide a good example of our prices in that presently DMS consortia members can place a call over the SUNCOM Network to anywhere in the United States at 7.4 cents per minute. In our previously filed comments, DMS sought clarification from the FCC on whether DMS may be directly reimbursed for the appropriate discounts from the USF for eligible entities and whether the published SUNCOM Network prices qualify as pre-discount prices against which the USF discounts may be applied. In its consortium role, DMS needs to recover the costs of our value-added services that are rolled into our SUNCOM rates, which in turn must be recognized as pre-discounted prices for the purpose of obtaining USF discounts.

Currently, DMS maintains detailed and separate records for inventory and billing on the services provided to all our users. Our record keeping system is sufficient to provide the necessary detail to identify the dollar amounts of individual USF discounts for each eligible entity. It is hoped that the additional requirements for methods to separate and report the accounting for individual entities will remain simple and be compatible with our established system.

In its role as a facilitator of state services, DMS is statutorily required to obtain the best pricing for its users through competitively procured purchasing and contract negotiation. All state agencies are **required** to utilize State of Florida contracts and SUNCOM Network services. However, political subdivisions, municipalities, and nonprofit organizations are **allowed** under the statutes to use state contracts and

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SUNCOM Network services. Since DMS is the agent and manager of master contracts supporting state services, the members of the DMS consortium should be exempt from the requirement that requested telecommunications services for USF discounts be posted on the SLC web site. As required by state public records law, all DMS contracts are accessible and will be available if requested by the SLC. In addition, eligible entities who have joined with our consortia should not be required to file copies of these voluminous contracts with each individual USF application but instead should be allowed to merely reference the DMS state contracts that relate to the telecommunications service discounts requested.

DMS concurs with the WGR that "no arbitrary limit" be placed on the terms of contracts utilized for the purpose of USF discounts. It is important to note that DMS enters into multi-year contracts by reserving the right to periodically review these contracts to evaluate shifts in market prices and by providing escape clauses that give DMS the option to terminate the contract at shorter intervals. Additionally, multi-year contracts can work to the State's advantage if market prices are increasing.

In the section on data standardization, the WGR recommends that the SLC "ensure that any standardized data formats are very simple and require the least possible change from existing data collection efforts by schools and libraries and their governing bodies." DMS has already developed a simple working database for the 5,500 eligible facilities that have complied with the requirements of the Florida EFII Act. Public access to this database information is currently available on the Intranet and the Internet. Recently, DMS negotiated a contract to continue development of the database and to also provide geographical mapping overlay capabilities. DMS emphasizes that it is critical that all data collection requirements established by the SLC be in sync with Florida's model database.

In summary, DMS supports the comments filed by the National Association of State Telecommunications Directors (NASTD). As aggregator for the consortia of eligible facilities in Florida, DMS seeks recognition as agent to directly obtain discounts from the USF based on DMS published prices. In this role, DMS must adhere to the State's competitive procurement laws and contracting process, and therefore Florida eligible facilities would be disadvantaged by Web posting requirements and arbitrary contract limits. DMS also requests that the USF application form be simple and straightforward and that Florida be allowed to utilize the Florida ATS form during the first year.

DMS appreciates the opportunity to provide input on the USF application and distribution process since the requirements set up by the FCC and the SLC will greatly

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influence the efficiency and cost effectiveness of the DMS process in procuring Advanced Telecommunications Services for Florida's schools, libraries, and rural health facilities. To summarize our main concern, it is crucial that the USF processes established on a national level not become burdensome to Florida institutions, but instead dovetail with our State's own initiatives in working toward the common goal of universal access for education and rural health care.

Sincerely,

A handwritten signature in cursive script that reads "Linda Nelson".

Linda Nelson, Acting Director  
Information Technology Program

LN:CM:WP:cwk:lncaton

Enclosures

# State of Florida SUNCOM Network

## Service Rates

January 1, 1997

Note: These rates are reduced frequently, so call SUNCOM at 1-888-4SUNCOM for updates.

## Voice Services

Long Distance Voice	In-state calling	7.4 cents per minute
	Out-of-state calling	7.4 cents per minute
	Canadian calling	20.0 cents per minute
Local Service Voice	Contract Main Station cost	
	plus \$1.75 administrative fee	
	Statewide avg. total = \$17.89 per Main Station	

## FLITES Data Services

**SUNCOM Backbone Circuits**  
(digital or analog) per DS-0 \$ .92 per mile per month

**AT&T InterLATA Circuits (analog only)** 3.38 per mile per month

**Dedicated T-1 Service** 8.00 per mile per month  
360.00 installation

**SNA Transport Service** 9.6 Kbps 232.00 per port per month  
19.2 Kbps 348.00 per port per month

### Capitol Center FDDI Ring (Tallahassee only)

TYPE	SPEED & FACILITY	INSTALLATION	MONTHLY RATE
Ethernet (IP Routing)	56Kbps	\$ 500.00	\$ 230.00
Ethernet/Token Ring	T-1	1275.00	440.00
Token Ring	4Mbps (fiber)	1375.00	565.00
Ethernet	10Mbps (fiber)	1475.00	595.00
Token Ring	16Mbps (fiber)	1500.00	665.00
FDDI	100Mbps	2200.00	2065.00

Includes first protocol - subsequent protocols are \$232/month per protocol

SERVICE ELEMENT	INSTALLATION	MONTHLY RATE
Access port charge - T-1	\$ 800.00	\$ 695.00
Access port charge - 128Kbps	800.00	375.00
Access port charge - 56Kbps	620.00	270.00
Dial-up Access (IP and IPX only)	0.00	20.00

Includes the cost of the premise DSU/CSU and router but not the local loop cost

### Internet Access

#### For Capitol Center FDDI, RTS and Frame Relay Users:

Firewalled Internet access is available to CCFDDI RTS and Frame Relay users. The firewall definition deployed is designed to protect the operational working files of state and local government users. These prices are an add-on to the pricing for CCFDDI RTS and Frame Relay connections. Access for Frame Relay users requires appropriate PVC's and CIR.

SERVICE ELEMENT	INSTALLATION	MONTHLY RATE
Internet Access for 256 address blocks	\$ 0	\$ 55.00 <sup>1</sup>
Internet Access for unlimited addresses	0	755.00 <sup>1</sup>
Dial-up Internet Access via RTS (single user)	0	20.00

#### For Dedicated Access from User Sites:

For SUNCOM subscribers that desire a separate, unrestricted and dedicated Internet access connection SUNCOM offers the following selection. These prices do not include the cost of the local telephone circuit to the subscriber site.

SERVICE ELEMENT	INSTALLATION	MONTHLY RATE
56 kbps site with 4-hour response	\$ 900.00	\$ 538.00 <sup>2</sup>
56 kbps site with 2-hour response	900.00	613.00 <sup>2</sup>
T-1 site with 4-hour response	1,050.00	1,321.00 <sup>2</sup>
T-1 site with 2-hour response *ID4	1,050.00	1,396.00 <sup>2</sup>
10 mb site with 4-hour response	3,150.00	5,055.00 <sup>2,3</sup>
10 mb site with 2-hour response	3,150.00	5,250.00 <sup>2,3</sup>
T-3 site with 4-hour response	3,150.00	11,250.00 <sup>2,3</sup>
T-3 site with 2-hour response	3,150.00	11,450.00 <sup>2,3</sup>

#### User Options for either Firewalled or Dedicated Internet Access:

SERVICE ELEMENT	INSTALLATION	MONTHLY RATE
On-site DNS Server Customers	\$ 450.00	\$ 510.00
DNS Customers (100 per order)	50.00	105.00
Firewall Customers	100.00	30.00
Usernet News Customers (per 256 addresses)	0.00	0.00

<sup>1</sup> Requires an RTS, Frame Relay or CCFDDI connection and provides firewalled access.

<sup>2</sup> Dedicated bandwidth to the Internet - includes premise router and dsu/csu - does not include the local loop or equivalent.

<sup>3</sup> Available in Tallahassee, Orlando and Miami.

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Ft. Lauderdale

Ft. Myers

Jacksonville

Miami

Orlando

Pensacola

Tallahassee

Tampa

West Palm Beach

## State Contract Services

Dial 800 Services	In-State	Out-of-State
Business Line	\$ 8.094	\$ 6.60 per hour*
Dedicated Line	\$ 5.58	\$ 4.05 per hour

\* Evening and Night/Weekend - \$ 6.12 per hour

### Calling Card Services

Surcharge	Florida Calls	17¢	per call
	Outside Florida	17¢	per call
Day Rate (8-5)	Florida Calls	13¢	per minute
	Outside Florida	11¢	per minute
Off-hours Rate	Florida Calls	11.2¢	per minute
	Outside Florida	9.25¢	per minute

## State Contract Services

Other communications equipment and services available under separate state contract include:

- Auditing Service of Telephone Billing
- Cellular Mobile Telephone Equipment & Service
- Data Communications Equipment
- Electronic Key Telephone Systems
- Facsimile Communications Equipment
- Feature Telephones
- Logging Recorders
- PABX Telephone Systems
- Pre-Subscription to Long Distance Service for Public Pay Telephones
- Radios, Paging Service
- Surge Suppressors
- Telecommunications Devices for the Deaf (TDD)
- Video Teleconferencing Equipment

**SUNCOM**  
NETWORK SERVICES

For features, availability and/or rates, please call:

**Toll Free 1-888-4SUNCOM or  
SUNCOM 277-2000 or 850/487-2000**

Information Technology Programs

Department of Management Services • State of Florida

STATE OF FLORIDA

**SUNCOM**  
NETWORK SERVICES

### Long Distance Telephone Service

### Local Telephone Service

### Florida Information Transport & Exchange System (FLITES):

Dedicated Data Service  
SNA Transport Service  
Capitol Center FDDI Service  
Internet Access  
Router Transport Service  
Frame Relay Transport Service

### Florida Government Teleconferencing Network

Information Technology Programs



DEPARTMENT OF MANAGEMENT  
**SERVICES**

To provide better access to education and health services for the citizens of Florida, it is the intent of the Advanced Telecommunications Services legislation to: provide eligible entities with advanced telecommunications services at reduced rates; encourage competition among providers to provide services; and encourage vendor partnerships to better serve eligible facilities.

## What is ATS?

### What are Advanced Telecommunications Services?

"Network-based or wireless services that provide additional communications capabilities enabling the use of application such as distance learning, video conferencing, data communications, and access to the Internet." (ss. 364.508)

### Who is eligible?

- Universities
- Community colleges
- Public schools and Technical schools
- Libraries
- Teaching hospitals and the Moffitt Cancer Research Center
- Rural hospitals and health clinics in areas not served by a rural hospital

### DMS will:

- negotiate reduced rates
- expand and upgrade the statewide broadband telecommunications network
- provide architectural, networking, and infrastructure support
- maintain state purchasing and leasing agreements
- provide product testing of emerging technologies
- maintain standards of interoperability
- provide technical and engineering support

## Who needs ATS?

# State of Florida SUNCOM Network

Service Rates - January 1, 1997

NOTE: These rates are updated frequently, so call SUNCOM at 1-888-4SUNCOM for updates.

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	plus \$1.75 administrative fee	
	Statewide avg. total = \$17.89 per Main Station	

## FLITES Data Services

<b>SUNCOM Backbone Circuits</b> (digital or analog) per DS-0		\$ .92 per mile per month
<b>AT&amp;T InterLATA Circuits</b> (analog only)		3.38 per mile per month
<b>Dedicated T-1 Service</b>		8.00 per mile per month 360.00 installation
<b>SNA Transport Service</b>	9.6 Kbps	232.00 per port per month
	19.2 Kbps	348.00 per port per month

### Router Transport Service

SERVICE ELEMENT	INSTALLATION	MONTHLY RATE
Access port charge - T-1	\$ 800.00	\$ 695.00
Access port charge - 128Kbps	800.00	375.00
Access port charge - 56Kbps	620.00	270.00
Dial-up Access (IP and IPX only)	0.00	20.00

Includes the cost of the premise DSU/CSU and router but not the local loop cost

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\$ 45.00  
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**Advanced  
TELECOMMUNICATIONS  
SERVICES**  
**Learn about ATS**

Providing the citizens of Florida with affordable electronic access to education and health care services.



**Hot Topics**  
What's New  
Hot Links  
Frequently Asked Questions



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**Request Services**  
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**Send us your Feedback**

Visit the Advanced Telecommunications Services site at:

**e-rate.state.fl.us**

For more information about ATS contact:

Advanced Telecommunications Services  
Department of Management Services  
4050 Esplanade Way, Suite 280  
Tallahassee, Florida 32399-0950

Phone: (850) 414-8873

Suncom: 994-8873

Fax: (850) 922-6149, Suncom 292-6149

E-Mail: ats@dms.state.fl.us

To contact your regional  
Telecommunications System Consultant,  
call 1-888-478-6266



DEPARTMENT OF MANAGEMENT  
**SERVICES**



# Advanced

**TELECOMMUNICATIONS  
SERVICES**

**Providing the citizens**

**of Florida with**

**affordable electronic**

**access to education**

**and health care services**

125.00/hour  
100.00/hour  
100.00/hour  
75.00/hour  
72.00/hour  
36.00/hour

100.00/hr./room  
75.00/hr./room

## Advanced Telecommunications Services Request Form

This form will be used to determine the total services that are needed to implement the Technology Plan and provide services for administrative needs. Attached to (or online at <http://www.gc.cc.fl.us/fdln/ttfappa.htm>) is a matrix to be used as a reference guide for establishing the bandwidth needed for specific distance learning applications.

### Field Testing Technologies

If field testing technologies are to be undertaken and the services being requested are not listed on the matrix, please supply detailed information about the pilot for purposes of future negotiations by the Department of Management Services.

Check one of the following categories:

K-12 \_\_\_\_ Community College \_\_\_\_ University \_\_\_\_ Teaching Hospital \_\_\_\_ Rural Hospital \_\_\_\_ Library \_\_\_\_

Name of entity requesting service: \_\_\_\_\_ If K-12, specify district: \_\_\_\_\_

Contact Person: \_\_\_\_\_ Phone No. (\_\_\_\_) (\_\_\_\_ - \_\_\_\_)

Facility/Identification Number: \_\_\_\_\_

Please complete the following questions:

#### 1. Check the appropriate application.

<input type="checkbox"/> Dial-up Internet Access	<input type="checkbox"/> High speed (digital) data transmitting and receiving
<input type="checkbox"/> Dial-up Administrative Data	<input type="checkbox"/> PC to PC/Mac to Mac software and screen sharing (external pt. to pt. Connection)
<input type="checkbox"/> Audio Conferencing	<input type="checkbox"/> Desktop video Conferencing
<input type="checkbox"/> Instructional transmission or Administrative use	<input type="checkbox"/> Group Video Conferencing (two way interactive or multi point)
<input type="checkbox"/> Video Tape Distribution	<input type="checkbox"/> Other _____
<input type="checkbox"/> Instructional TV programming	<input type="checkbox"/> Other _____

2. Provide a detailed (but brief) description of your project request. (For this question only, attachments may be used.)

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3. What equipment is in place to accomplish the distance learning project(s)? (Include all equipment being used in the project, needed for connectivity, and ongoing service.)

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4. If equipment is needed and must be purchased, give the approximate date of purchase of the equipment. List equipment and when it will be ready for service.

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5. What services (bandwidth) are you requesting for the distance learning project(s)?

Telephony ____	Multi 56 KBS ____	Multi 1.544 MBS ____	45 MBS ____
56 KBS ____	1.544 MBS ____	10 MBS ____	Other ____

6. What additional service (bandwidth) is needed for administrative purposes? (Include the number of phone lines presently being used by the administration.)

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7. Have appropriate standards been incorporated to ensure compatibility and interoperability?  
☐ Yes ☐ No

8. Is there a technician or technical person to assist in setting up equipment when the services are delivered? (For testing purposes.) ☐ Yes ☐ No

9. Where are the Advanced Telecommunications Services to be connected?

Address \_\_\_\_\_ Room Number \_\_\_\_\_ Zip Code \_\_\_\_\_

Contact Person \_\_\_\_\_ Phone No. (\_\_\_\_) (\_\_\_\_-\_\_\_\_)

10. Is the Advanced Telecommunication Services location ready to receive the requested new services? ☐ Yes  
☐ No

11. State the date the service will be needed. \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

